217/782-2113

# TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT and TITLE I PERMIT 1

#### PERMITTEE

LTV Steel Company, Inc. - Hennepin Works

Attn: P. J. Downey Route 71, Box 325

Hennepin, Illinois 61327

Application No.: 96030018 I.D. No.: 155801AAA

Applicant's Designation: Date Received: March 04, 1996

Operation of: Cold Rolled Steel Operation

Date Issued: TO BE DETERMINED Expiration Date<sup>2</sup>: DATE

Source Location: Route 71, Box 325, Hennepin, Putnam Responsible Official: P. J. Downey, General Supervisor

This permit is hereby granted to the above-designated Permittee to OPERATE a Cold Rolled Steel Operation, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Michael J. Knobloch at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:MJK:jar

cc: Illinois EPA, FOS, Region 2

This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

Except as provided in Condition 8.7 of this permit.

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#### 1.0 SOURCE IDENTIFICATION

#### 1.1 Source

LTV Steel Company, Inc. - Hennepin Works Route 71, Box 325 Hennepin, Illinois 61327 815/925-2133

# 1.2 Owner/Parent Company

LTV Steel Company, Inc. P.O Box 6778 Cleveland, Ohio 44101

# 1.3 Operator

LTV Steel Company, Inc. - Hennepin Works Route 71, Box 325 Hennepin, Illinois 61327

P. J. Downey, General Supervisor 815/925-2133

# 1.4 General Source Description

The LTV Steel Company, Inc., Hennepin Works facility is located at route 71, Box 325 in Hennepin, Illinois. The facility is a cold rolled steel operation.

# 2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]	
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1,	
	Stationary Point and Other Sources (and Supplements A	
	through F), USEPA, Office of Air Quality Planning and	
	Standards, Research Triangle Park, NC 27711	
Btu	British thermal unit	
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]	
CAAPP	Clean Air Act Permit Program	
CAM	Compliance Assurance Monitoring	
CFR	Code of Federal Regulations	
ERMS	Emissions Reduction Market System	
HAP	Hazardous Air Pollutant	
hr	hour	
IAC	Illinois Administrative Code	
I.D. No.	Identification Number of Source, assigned by Illinois EPA	
ILCS	Illinois Compiled Statutes	
Illinois EPA	Illinois Environmental Protection Agency	
kW	kilowatts	
lb	pound	
mmBtu	Million British thermal units	
NESHAP	National Emission Standards for Hazardous Air Pollutants	
$NO_x$	Nitrogen Oxides	
NSPS	New Source Performance Standards	
PM	Particulate Matter	
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or	
	equal to a nominal 10 microns as measured by applicable test	
	or monitoring methods	
ppm	parts per million	
PSD	Prevention of Significant Deterioration	
RMP	Risk Management Plan	
SO <sub>2</sub>	Sulfur Dioxide	
T1	Title I - identifies Title I conditions that have been	
man	carried over from an existing permit	
T1N	Title I New - identifies Title I conditions that are being	
T1R	established in this permit  Title I Revised - identifies Title I conditions that have	
IIK	been carried over from an existing permit and subsequently	
	revised in this permit	
USEPA	United States Environmental Protection Agency	
VOM	Volatile Organic Material	
v OI:1	volucite Organic MacCitai	

#### 3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:
  - 32 Indirect Fired Natural Gas Comfort Heaters (3.0 mmBtu/hr)
  - 18 Indirect Fired Natural Gas Comfort Heaters (3.25 mmBtu/hr)
  - 24 Storage Tanks (PH8, GL3, GL4, GL14 GL19, RS1 RS8, WT17, WT18, WT24
  - 1 Chromic Acid Bath Galvanize Line
  - 1 Wastewater Treatment Lime Addition and Recovery System
  - 2 Wastewater Treatment Cement Dust Addition and Recovery Systems
  - 2 Flash Buff Welders (Electric) Shot Blast Baghouse (CE-11)
- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:
  - 3 Electrostatic Oilers
  - 1 South Slitter Line Rolling Oiler
  - 1 Temper Mill
  - 1 Wastewater Treatment Plant
  - PL5 Waste Pickle Liquor
  - WT4 Waste Pickle Liquor
  - WT5 Waste Pickle Liquor
  - WT16 H<sub>2</sub>SO<sub>4</sub>
  - WT19 Waste Pickle Liquor
  - WT20 Waste Pickle Liquor
  - WT23 Waste Pickle Liquor
- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and

(C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood  $[35 \text{ IAC } 201.210\,(a)\,(4)]$ .

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Storage tanks of any size containing virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

Coating operations (excluding powder, architectural and industrial maintenance coating) with aggregate VOM usage that never exceeds 15 lbs/day from all coating lines at the source, including VOM from coating, dilutents, and cleaning materials [35 IAC 201.210(a)(13)].

Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210 (b).
- 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

# 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

FINAL DRAFT/PROPOSED CAAPP PERMIT

LTV Steel - Hennepin Works
I.D. No.: 155801AAA
Application No.: 96030018
August 21, 2002

# 4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission		Date	Emission Control
Unit	Description	Constructed	Equipment
01	Pickle Line (EU-1)	1967	Acid Fume Scrubber
02	Tandem Mill (EU-2)	1967	Mist Eliminator #1 and #2
03	Annealing Furnace (FCU-3) 153 mmBtu/hr	1967	None
	Galvanneal Furnace (FCU-4) 27 mmBtu/hr	1995	None
	6 Single Stack Furnaces (FCU-5A) 6 mmBtu/hr	1967	None
	18 Four Stack Furnaces (FCU-5B) 14 mmBtu/hr	1967	None
04	Utility Boiler #1 (FCU-6A) 179 mmBtu/hr	1967	None
	Utility Boiler #2 (FCU-6B) 179 mmBtu/hr	1967	None
05	10,000 Gallon Gasoline Storage Tank		Vapor Return Line
Fugitive VOM Emissions	VOM Fugitive Emissions		None

#### 5.0 OVERALL SOURCE CONDITIONS

- 5.1 Source Description
  - 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of  $NO_x$ , PM, and HAP emissions.
- 5.2 Applicable Regulations
  - 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
  - 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
    - a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
      - Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.
    - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
  - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

# 5.2.6 Episode Action Plan

a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside
     of the city of Chicago: Cook County
     Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.
- 5.2.7 PM<sub>10</sub> Contingency Measure Plan

Should this stationary source, as defined in 35 IAC 212.700, become subject to the requirement to prepare and submit a contingency measure plan reflecting the  $PM_{10}$  emission reductions as set forth in 35 IAC 212.703, then the owner or operator shall submit such plan to the Illinois EPA for review and approval within ninety (90) days after the date this source becomes subject to this requirement. Such plan will be incorporated by reference into this permit and shall be implemented in accordance with 35 IAC 212.704. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U, incorporated herein by reference.

5.2.8 CAM Plan

N/A

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

#### 5.5 Source-Wide Emission Limitations

#### 5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

# Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	78.86
Sulfur Dioxide (SO <sub>2</sub> )	2.16
Particulate Matter (PM)	129.40
Nitrogen Oxides (NO <sub>x</sub> )	1,143.10
HAP, not included in VOM or PM	0
Total	1,353.52

#### 5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

#### 5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

# 5.6 General Recordkeeping Requirements

# 5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for

the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 General Records for Specific Groups Of Units

N/A

5.6.3 Records for Specific Sub-Groups Within The General Recording Group

N/A

5.6.4 Records for VOM and HAP Emissions

N/A

5.6.5 Records for Operating Scenarios

N/A

- 5.6.6 Retention and Availability of Records
  - a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
  - b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 5.7 General Reporting Requirements
  - 5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

N/A

5.8 General Operational Flexibility/Anticipated Operating Scenarios  $${\rm N/A}$$ 

- 5.9 General Compliance Procedures
  - 5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

#### 7.0 UNIT SPECIFIC CONDITIONS

7.1 Unit 01: Pickle Line, Acid Storage Tanks
Control 01: Pickle Tanks Acid Fume Scrubbers

#### 7.1.1 Description

Steel coils are pickled in a hot hydrochloric acid solution to remove the oxide scale that forms during hot rolling of steel in air. Evaporative losses from the tanks are ducted to one of two packed bed scrubbers before being emitted to the atmosphere. The coils then are rinsed, air dried, and sometimes coated lightly with a non-VOC oil before being sheared and wound as coil again. The hydrochloric acid awaiting use in the pickle tanks is stored in one of two 21,000 gallon storage tanks. The vapor from these tanks is also ducted to the pickling scrubbers.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
01	Pickling Line	Acid Fume Scrubber
	2 Acid Storage Tanks (21,000 Gallon Each)	Acid Fume Scrubber

- 7.1.3 Applicability Provisions and Applicable Regulations
  - a. The "affected pickling line" for the purpose of these unit-specific conditions, is the emission unit defined in Condition 7.1.2.
  - b. The affected pickling line is subject to 35 IAC 212.123 which states:
    - i. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to Section 212.122 of this Subpart.
    - ii. The emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period, providing that such opaque emission permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the

center point of any such emission unit owned or operated by such person and provided further that such opaque emissions permitted from each such fuel combustion emission unit shall be limited to 3 times in any 24 hour period. [35 IAC 212.123]

- c. The "affected acid storage tanks" for the purpose of these unit-specific conditions, is the two 21,000 gallon tanks defined in Condition 7.1.2.
- 7.1.4 Non-Applicability of Regulations of Concern
  - a. The pickling line is not subject to 35 IAC 212.322(b)(2) because of the exemption in 35 IAC 266.190(a).
- 7.1.5 Operational and Production Limits and Work Practices

None

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected pickling line is subject to the following:

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Operating Requirements

None

- 7.1.8 Monitoring Requirements
  - a. The Permittee shall visually monitor water flow to the scrubber and document when water flow has ceased and the pickling process is still in operation.
- 7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected pickling line to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain monthly and annual records of acid usage in lb/mo and lb/yr.

# 7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected pickling line with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].
- 7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

# 7.1.12 Compliance Procedures

a. Compliance with Condition 5.5.1 is based on the recordkeeping requirements in Condition 7.1.9 and the following emission calculation and formula.

# PM Emission Calculations from the Pickling Line

PM Emissions (tons) = [(acid usage (lb))  $\times$  (.014384 lb PM/lb acid)/2000 lb/ton]

b. Compliance with Condition 7.1.2 b. is demonstrated by operating the scrubber in accordance with the standard operating procedures.

7.2 Unit 02: Tandem Mill Control 02: Tandem Mill Mist Eliminator #1 and #2

# 7.2.1 Description

The tandem mill consists of five stands whose rolls reduce the cross section of the steel coils to the desired specification. This mechanical working of the metal produces large amounts of heat. To cool the coils during working, a solution of 97% water and 3% rolling oil containing VOM is sprayed on the coils. The excess solution that is collected in a tank system below the tandem mill floor level is recycled and reused as solution. The mist eliminators condense most of the steam solution before being discharged outdoor.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
02	Tandem Mill (EU-2)	Tandem Mill Mist
		Eliminator #1 and #2

# 7.2.3 Applicability Provisions and Applicable Regulations

- a. The "affected tandem mill" for the purpose of these unit-specific conditions, is the emission unit defined in Condition 7.2.2.
- b. The affected tandem mill is subject to the emission limits identified in Condition 5.2.2.
- c. The affected tandem mill is subject to 35 IAC 212.322 which states:
  - i. Except as further provided in this Part, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of this Section.
  - ii. Interpolated and extrapolated values of the data in subsection (c) of this Section shall be determined by using the equation:

 $E = C + A(P)^B$ 

#### Where:

P = Process weight rate; and,

E = Allowable emission rate; and,

 For process weight rates up to 27.2 Mg/hr (30 T/hr)

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
Α	1.985	4.10
В	0.67	0.67
С	0	0

2. For process weight rates in excess of 27.2
 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
В	0.11	0.11
С	- 18.4	- 40.0

[35 IAC 212.322]

d. The affected tandem mill is subject to 35 IAC 215.301 which states:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 215.301]

7.2.4 Non-Applicability of Regulations of Concern

None

7.2.5 Operational and Production Limits and Work Practices

None

#### 7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected tandem mill is subject to the following:

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

# 7.2.7 Operating Requirements

None

# 7.2.8 Monitoring Requirements

a. The Permittee shall visually monitor water flow to the scrubber and document when water flow has ceased and the tandem mill is still in operation.

# 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected tandem mill to demonstrate compliance with Condition 5.5.1 and Condition 7.2.6, pursuant to Section 39.5(7) (b) of the Act:

a. The Permittee shall maintain monthly and annual records of steel throughput in ton/mo and ton/yr.

# 7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected tandem mill with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

# 7.2.12 Compliance Procedures

a. Compliance with Condition 5.5.1 is based on the recordkeeping requirements in Condition 7.2.9 and the following emission calculations and formulas.

# VOM Emission Calculations from the Tandem Mill

VOM Emissions (tons) = [(steel throughput (ton)) x (.0176 lb/ton steel)/2000 lb/ton]

The above emission factor was derived from a 1972 stack test.

- b. Compliance with Condition 7.2.3 c. is demonstrated by calculating emissions based on production throughput and the given equation.
- c. Compliance with Condition 7.2.3 d. is demonstrated by calculating emissions based on production throughput and emission factors.

7.3 Unit 03: Galvanizing Line Control 03: None

#### 7.3.1 Description

This is a continuous process where coils are welded together, passed through a furnace and then through a molten zinc pot to galvanize the strip. The coil may also pass through a galvanneal furnace where the galvanized strip is annealed further. Lastly the coil is sheared, oiled, and recoiled.

# 7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
03	Annealing Furnace (FCU-3), 153 mmBtu/hr	None
	Galvanneal Furnace (FCU-4), 27 mmBtu/hr	None
	6 Single Stack Furnace (FCU-5A), 6 mmBtu/hr Each	None
	18 Four Stack Furnaces (FCU-5B), 14 mmBtu/hr Each	None

# 7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected galvanizing line" for the purpose of these unit-specific conditions, consists of the two furnaces defined in Condition 7.3.2, (FCU-3) and (FCU-4).
- b. The "affected batch annealing line" for the purpose of these unit-specific conditions, consists of the (FCU-5A) and (FCU-5B) groupings of furnaces.
- c. The affected galvanizing line and batch annealing line is subject to the emission limits identified in Condition 5.2.2.
- d. The affected galvanizing line furnaces and batch annealing line furnaces (excluding FCU-5A) are subject to 35 IAC 216.121 which states:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

# 7.3.4 Non-Applicability of Regulations of Concern

- a. The affected galvanizing line and affected annealing line furnaces are not subject to 35 IAC 217.121 because the furnaces are less than 250 mmBtu/hr of actual heat input.
- b. The affected galvanizing line and affected annealing line furnaces are not subject to 35 IAC 215.301 because of the exemption in 215.303.

#### 7.3.5 Operational and Production Limits and Work Practices

a. The affected galvanizing line furnace (FCU-4) shall be operated and maintained in accordance with the manufacturers recommendations to achieve 0.1 lb  $_{\mbox{NO}_{\mbox{\tiny X}}}/mmBtu$ .

The above limitations were established in Permit 72090135, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

#### 7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the galvanizing line furnace (FCU-4) is subject to the following:

Pollutant	Ton/Yr
PM	0.52
CO	2.95
$NO_x$	8.42
VOM	0.23

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 72090135, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

#### 7.3.7 Operating Requirements

a. The affected galvanizing line furnace (FCU-4) may combust only natural gas.

The above limitations were established in Permit 72090135, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

b. The affected galvanizing line furnace (FCU-3) and the affected batch annealing line furnaces (FCU-5A and FCU-5B) shall combust only natural gas.

# 7.3.8 Monitoring Requirements

None

#### 7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected galvanizing line to demonstrate compliance with Condition 5.5.1 and Condition 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain monthly and annual records of natural gas combusted in mmscf/mo and mmscf/yr for all affected lines.

# 7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the galvanizing and annealing lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].
- 7.3.11 Operational Flexibility/Anticipated Operating Scenarios  ${\tt None}$

#### 7.3.12 Compliance Procedures

a. Compliance with Condition 5.5.1 and Condition 7.3.6 is based on the recordkeeping requirements in Condition 7.3.9 and the following emission calculations and formulas.

Emission Calculations for the Galvanizing Line Furnaces (FCU-3), (FCU-4) and Batch Annealing Furnaces (FCU-5B)

	Emission Factor
Pollutant	(lb/mmscf)
CO	35
$NO_x$	140
PM <sub>10</sub>	6.2
$SO_2$	0.6
PM	6.2
MOV	2.8

Emissions (tons) =  $[(appropriate emission factor (lb/mmscf)) \times ((natural gas usage (mmscf))/2000 lb/ton]$ 

The above emission factor are from AP-42, 5th edition, 1995.

Emission Calculations for the Batch Annealing Furnaces (FCU-5A)

	Emission Factor
Pollutant	(lb/mmscf)
CO	21
NO <sub>x</sub>	100
$PM_{10}$	4.5
SO <sub>2</sub>	0.6
PM	4.5
VOM	5.3

Emissions (tons) =  $[(appropriate emission factor (lb/mmscf)) \times ((natural gas usage (mmscf))/2000 lb/ton]$ 

The above emission factor are from AP-42,  $5^{\text{th}}$  edition, 1995.

b. Compliance with Condition 7.3.3 c. and d. is demonstrated by combustion of natural gas in the affected furnace lines.

7.4 Unit 04: Utility Boilers #1 and #2 Control 04: None

# 7.4.1 Description

The Hennepin facility operates two boilers to provide onsite steam. There are also several gas-fired space heaters that are located throughout the plant that fire only natural gas.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
04	Boiler #1 (FCU-6A) 179 mmBtu/hr	None
	Boiler #2 (FCU-6B) 179 mmBtu/hr	None

# 7.4.3 Applicability Provisions and Applicable Regulations

- a. The "affected boilers" for the purpose of these unitspecific conditions, is the emission unit defined in Condition 7.4.2.
- b. The affected boilers are subject to the emission limits identified in Condition 5.2.2.
- c. The affected boilers are subject to 35 IAC 216.121 which states:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air. [35 IAC 216.121]

# 7.4.4 Non-Applicability of Regulations of Concern

- a. The affected boilers are not subject to 35 IAC 217.121 because the boilers are less than 250 mmBtu/hr of actual heat input.
- b. The affected boilers are not subject to 35 IAC 215.301 because of the exemption in 215.303.
- c. The affected boilers are not subject to Subpart D -Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction Is Commenced After August 17, 1971 because the boilers were constructed prior to 1971.

- d. The affected boilers are not subject to Subpart Db -Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units because the boilers were constructed prior to June 19, 1984.
- e. The affected boilers are not subject to Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because the boilers were constructed prior to June 9, 1989.
- 7.4.5 Operational and Production Limits and Work Practices
  - a. Natural gas shall be the only fuel fired in the boilers.
- 7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the affected boilers are subject to the following:

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

- 7.4.7 Operating Requirements
  - a. Natural gas shall be the only fuel fired in the boilers.
- 7.4.8 Monitoring Requirements

None

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain monthly and annual records of natural gas combusted in mmscf/mo and mmscf/yr for all affected boilers.

# 7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected boilers with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe

the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].
- 7.4.11 Operational Flexibility/Anticipated Operating Scenarios

None

# 7.4.12 Compliance Procedures

a. Compliance with Condition 5.5.1 is based on the recordkeeping requirements in Condition 7.4.9 and the following emission calculations and formulas.

Emission Calculations for the Utility Boilers #1 and #2

	Emission Factor
Pollutant	(lb/mmscf)
CO	40
$NO_x$	550
$PM_{10}$	5
$SO_2$	0.6
PM	5
VOM	1.4

Emissions (tons) = [(appropriate emission factor (lb/mmscf)) x ((natural gas usage (mmscf))/2000 lb/ton]

The above emission factor are from AP-42, 5th edition, 1995.

c. Compliance with Conditions 7.4.3 b. and c. is assured by combustion of natural gas.

7.5 Unit 05: Underground Gasoline Storage Tank Control 05: Vapor Return Line to Truck

# 7.5.1 Description

The Hennepin facility operates a 10,000 gallon storage tank for gasoline.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
05	10,000 Gallon Gasoline	Vapor Return Line
	Storage Tank	

- 7.5.3 Applicability Provisions and Applicable Regulations
  - a. The "affected gasoline storage tank" for the purpose of these unit-specific conditions, is the emission unit defined in Condition 7.5.2.
  - b. The affected gasoline storage tank is subject to 35 IAC 215.122 b) which states:

No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill or an equivalent device approved by the agency according to the provisions of 35 Ill. Adm. Code 201, or unless such tank is a pressure tank as described in Section 215.121 (a) or is fitted with a recovery system as described in Section 215.121(b)(2).

- 7.5.4 Non-Applicability of Regulations of Concern
  - a. The affected gasoline storage tanks are not subject to 35 IAC 215.123 because these regulations do not apply to tanks of this size.
- 7.5.5 Operational and Production Limits and Work Practices

None

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the gasoline storage tank is subject to the following:

Pollutant	Ton/Yr
VOM	1.0

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

The above limitations were established in Permit 88110067, pursuant to 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 [T1].

# 7.5.7 Operating Requirements

None

# 7.5.8 Monitoring Requirements

None

# 7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected gasoline storage tank to demonstrate compliance with Condition 5.5.1 and Condition 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall maintain monthly and annual records of gasoline throughput in gal/mo and gal/yr for the affected storage tank.

# 7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected gasoline storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in

accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

For the purpose of estimating VOM emissions from the affected storage tank, the current version of the tanks program is acceptable.

7.6 Unit 06: VOM Emissions from Solvent Usage Control 06: None

7.6.1 Description

The Hennepin facility emits fugitive VOM emissions from solvent usage.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission		Emission Control
Unit	Description	Equipment
06	VOM Fugitive Emissions	None
	From Solvent Usage	

- 7.6.3 Applicability Provisions and Applicable Regulations
  - a. The "affected fugitive emission operations" for the purpose of these unit-specific conditions, is the emission unit defined in Condition 7.6.2.
  - b. The affected fugitive emission operations are subject to 35 IAC 215.301 which states:

No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material. [35 IAC 215.301]

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Operational and Production Limits and Work Practices

None

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5, the fugitive emission operations are subject to the following:

There are no specific emission limitations for this unit, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.6.7 Operating Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fugitive emission operations to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain monthly and annual records of solvent usage in gal/mo and gal/yr.
- b. The Permittee shall maintain a file of MSD Sheets for the solvents used showing the VOM content and densities.
- c. The Permittee shall maintain operating hours (hr/mo) and (hr/yr) for solvent usage at the facility to aid in determination of 7.6.3 b.

## 7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the affected fugitive emission operations with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

- a. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].
- 7.6.11 Operational Flexibility/Anticipated Operating Scenarios

None

# 7.6.12 Compliance Procedures

Compliance with Condition 5.5.1 is based on the recordkeeping requirements in Condition 7.6.9 and the following emission calculations and formulas.

VOM Emissions (tons) =  $\Sigma$  [(individual solvent usages (gal)) x (individual solvent density (lb/gal)) x (percent VOM in solvent)/100)]/2000 lb/ton

### 8.0 GENERAL PERMIT CONDITIONS

#### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after \_\_\_\_\_\_ {insert public notice start date} (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

- 8.4 Operational Flexibility/Anticipated Operating Scenarios
  - 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying

for or obtaining an amendment to this permit, provided that [Section 39.5(12) (a) (i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

## 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

## Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

#### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

## 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA Air Compliance Section

Illinois Environmental Protection Agency Bureau of Air Compliance Section (MC 40) P.O. Box 19276 Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency Division of Air Pollution Control 5415 North University

Peoria, Illinois 61614 iii. Illinois EPA - Air Permit Section

> Illinois Environmental Protection Agency Division of Air Pollution Control Permit Section (MC 11) P.O. Box 19506 Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J) Air & Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604

- Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.
- 8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

### 9.0 STANDARD PERMIT CONDITIONS

#### 9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
  - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
  - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
  - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

## 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

### 9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

## 9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

### 9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

## 9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

### 9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.
- 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

## 9.5 Liability

## 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

#### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

## 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

## 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

## 9.6 Recordkeeping

## 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

## 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

## 9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

### 9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technologybased emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;
- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

## 9.12 Reopening and Reissuing Permit for Cause

## 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

## 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

## 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

## 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

## 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

### 10.0 ATTACHMENTS

10.1 Attachment 1 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	
Name:	
Official Title:	
Telephone No.:	
Date Signed:	

## 10.2 Attachment 2 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

- 1. <u>Administrative Permit Amendment;</u>
- 2. Minor Permit Modification; and
- 3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

## 1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA. This shall be handled by completing form 272-CAAPP, REQUEST FOR OWNERSHIP CHANGE FOR CAAPP PERMIT; or
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits.

## 2. Minor Permit Modification

- Do not violate any applicable requirement;
- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements

in the permit;

- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA;
- Are not required to be processed as a significant permit modification; and
- Modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT for the Illinois EPA to use to notify USEPA and affected States.

## 3. <u>Significant Permit Modification</u>

 Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

• A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

		For Illinois EPA use only					
Application For Construction			I.D. number:				
Application For Construction Permit (For CAAPP Sources Only)		Permit number:					
			Date received:				
	This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.						
Source Information							
1.	Source name:						
2.	Source street address:						
3.	City:			4. Zip code:			
5.	Is the source located within city limits?			Yes No			
6.	Township name:	7. Count	у:	8. I.D. number:			
		Owner In	formation				
9.	Name:						
10.	Address:						
11.	City:	12. State:		13. Zip code:			
	Operator	r Information (	(if different fr	om owner)			
14.	Name		`	,			
15.	Address:						
16.	City:	17. State:		18. Zip code:			
19.	Who is the applicant?		Information All correspondent	ce to: (check one)			
	Who is the applicant? 20. All correspondence to: (check one) ☐ Owner ☐ Operator ☐ Source						
21.	Attention name and/or title for written correspondence:						
22.	Technical contact person	for application:	23. Co	ontact person's telephone number:			

This Illinois EPA is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

	Summary Of Application Contents				
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs:	☐ Yes ☐ No			
	<ul> <li>a) Non-attainment New Source Review – 35 IAC Part 203;</li> <li>b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21;</li> <li>c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?</li> </ul>				
25.	Does the application identify and address all applicable emissions standards, including those found in the following:  a) Board Emission Standards – 35 IAC Chapter I, Subtitle B;  b) Federal New Source Performance Standards – 40 CFR Part 60;  c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No			
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No			
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No			
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No			
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No			
submitted, in accordance with applicable rules and regulations?		<ul><li>☐ Not Applicable,</li><li>No TRADE</li><li>SECRET</li><li>information in</li><li>this application</li></ul>			
Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.					
Signature Block					
	This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete				

Signature Block					
	This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.				
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:				
ВУ	r: 				
	AUTHORIZED SIGNATURE	TITLE OF SIGNATORY			
	TYPED OR PRINTED NAME OF SIGNATORY	DATE			

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.4 Attachment 4 - Guidance on Renewing This Permit

 $\overline{\text{Timeliness}}$  - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC  $\overline{270.301}$ (d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

- A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
- 2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
- A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
- 4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
- 5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
- 6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
- 7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
- 8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
- 9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency Division of Air Pollution Control Permit Section (MC 11) P.O. Box 19506 Springfield, Illinois 62794-9506